

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

NO. 3:16-CR-359-K

LANCE ALVIN COUBRY (1)

FACTUAL RESUME

The defendant, Lance Alvin Coubry, has reviewed with his attorney, Dimitri Dube, and acknowledges that he understands in order to establish his guilt for Count One of the Indictment filed against him, namely being a Felon in Possession of Firearm, in violation of 18 U.S.C. § 922(g)(1), the government must prove each of the following elements beyond a reasonable doubt:

- First: Coubry knowingly possessed a firearm. The term “firearm” means any weapon that will or is designed to or may readily be converted to expel a projectile by the action of an explosion;
- Second: Before Coubry possessed the firearm, a court of law convicted him of a crime punishable by imprisonment for a term in excess of one year, that is, a felony offense; and
- Third: The possession of the firearm was in or affected interstate commerce; that is, at some time before Coubry possessed the firearm, it had traveled from one State or Country to another.

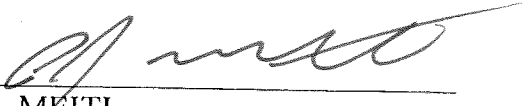
Stipulated Facts

Coubry admits that on August 2, 2016, in the Dallas Division of the Northern District of Texas, after having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, he knowingly and unlawfully possessed a


firearm and that the firearm had previously been shipped and transported in interstate and/or foreign commerce.

Specifically, Coubry possessed a (1) Stoeger Cougar .40 S&W pistol, Serial Number T6429-14D00265, (2) a Taurus PT140 Pro .40 S&W pistol, Serial Number SCP55494, (3) a Bryco Arms Model 38 .32 auto pistol, Serial Number 009026, and a (4) Llama Mod 1 .32 auto pistol, Serial Number 139540, after he had been convicted of a felony, and that these firearms were manufactured outside the State of Texas and traveled to Texas. All of these weapons were found in Coubry's bedroom. The Bryco Arms Model was a stolen weapon. This conduct violated §922(g)(1).

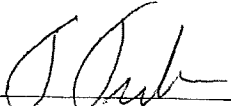
This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support Coubry's guilty plea to Count One set forth in the Indictment.

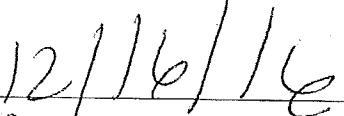
  
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12/18/16  
Date

  
LANCE ALVIN COUBRY  
Defendant

12/16/16  
Date

  
\_\_\_\_\_  
DIMITRI DUBE  
Attorney for the Defendant

  
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Date